

**Federal Defenders  
OF NEW YORK, INC.**

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April 4, 2023

**BY ECF**

Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

**The Application is granted.**

**SO ORDERED:**



**Paul G. Gardephe, U.S.D.J.**

Dated: April 5, 2023

**Re: *United States v. Anthony Rose*, 19 Cr. 789 (PGG)**


Dear Judge Gardephe:

I write without objection from Pretrial Services or the Government to respectfully request two modifications to Anthony Rose's bail conditions.

First, I respectfully ask the Court to modify Mr. Rose's travel restrictions to allow his attendance at several business-related trainings and conferences over the next six weeks. Since his release on bail in this case, Mr. Rose has traveled numerous times in connection with his work, always without incident. *See, e.g.*, ECF No. 200, 213, 289, 337, 401, 556, 667, 892. Mr. Rose now requests the Court's permission to travel for work-related trainings and conferences on the following dates:

- 4/14/2023 – 4/16/2023: Charlotte, NC
- 4/18/2023 – 4/20/2023: Asheville and Charlotte, NC
- 4/28/2023 – 5/1/2023: Myrtle Beach, SC and Charlotte, NC
- 5/5/2023 – 5/7/2023: Charlotte and Durham, NC
- 5/19/2023 – 5/22/2023: Charlotte, NC and Washington, DC

Second, Mr. Rose seeks permission to change his permanent residence to Charlotte, North Carolina and transfer his pretrial supervision to the Western District of North Carolina. I have spoken with U.S. Pretrial Services Officer Assistant Jazzlyn Harris, who indicated that, if directed by the Court, she and her office can reach out to the Western District of North Carolina to initiate courtesy supervision. As evidenced by Mr. Rose's travel requests, Charlotte is the location of his longtime business partner, Deanna Covington. [REDACTED]



As previously noted, neither Pretrial Services nor the Government objects to these requests. Thank you for considering them.

Respectfully submitted,

/s/ Ariel Werner  
Ariel Werner, Esq.  
Assistant Federal Defender  
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cc: Mathew Andrews, Assistant U.S. Attorney  
Louis Pellegrino, Assistant U.S. Attorney  
Jazzlyn Harris, U.S. Pretrial Officer Assistant